



## U.S. Department of Justice

United States Attorney  
Southern District of New York

26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278

July 5, 2025

**BY ECF**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Todd LaBarca*, 11 Cr. 12 (RMB)**

Dear Judge Berman:

The Government respectfully submits this letter to request a brief adjournment of its opposition deadline to respond to the defendant's renewed motion for compassionate release. On June 10, 2025, the defendant filed his third motion for compassionate release. (Dkt. No. 1168). Thereafter, the Court ordered the Government to respond by July 11, 2025. (Dkt. No. 1170). Since that time, the undersigned has been engaged in a trial in this District, which concluded earlier this week. The undersigned will further be traveling for the next couple of weeks following the conclusion of trial. The Government therefore respectfully requests a two-week adjournment of its opposition deadline in this matter, to on or after July 25, 2025.

Respectfully submitted,

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

by: /s/ Mitzi Steiner  
Mitzi S. Steiner  
Assistant United States Attorney  
(212) 637-2284

Application Granted. The Government is  
respectfully requested to submit its response  
by July 25, 2025.

SO ORDERED:

Date: 7/7/2025

*Richard M. Berman*  
Richard M. Berman, U.S.D.J.